

EXHIBIT A

DECLARATION OF THOMAS COLEMAN

COUNTY OF Santa Fe)
)ss.
STATE OF New Mexico)

I, THOMAS COLEMAN, under penalty of perjury, declare as follows:

1. I am the President of Innovativ Media Group ("IMG"). I am over the age of 18 years old, and possess personal knowledge of the facts set forth in this declaration.

2. Innovativ has been a stockholder of record of 500,000 shares of defendant FTE Networks, Inc. ("FTE") for over six months.

3. FTE does not have a principal office, or any office, in Nevada.

4. Exhibit 1 to Plaintiffs' Ex Parte Temporary Restraining Order and Motion for Preliminary Injunction ("Motion") is a true and accurate copy of a printout from the Nevada Secretary of State confirming that FTE is a Nevada corporation whose registered agent's office is located in Clark County, Nevada.

5. Exhibit 3 to the Motion is a true and correct copy of the letter that my counsel sent to FTE in January 2022, requesting a shareholder meeting.

6. FTE did not notice any shareholder meeting in response to that letter.

7. Exhibit 4 to the Motion is a true and correct copy of a letter that my counsel sent to FTE on February 3, 2022, containing an amendment to FTE's bylaws that was signed by myself on behalf of IMG, and by what I believe is a majority of FTE's current shareholders.

8. Exhibit 5 to the Motion is a true and correct copy of a letter that my counsel received from FTE in response to the amendment.

9. Exhibit 6 is a true and correct copy of a letter that my counsel sent to FTE on February 8, 2022.

10. FTE has not allowed IMG to inspect the stockholder list.

11. FTE has not noticed any shareholder meeting.

12. At the end of December 2021 I contacted FTE via our New York attorney, Barry Kazan of Mintz & Gold, and requested information about FTE and its operations since none had been published in over a year. After weeks of excuses and delays, FTE's general counsel

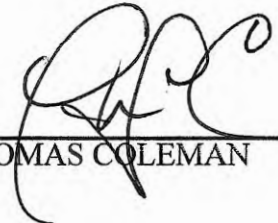
1 responded and refused to provide any information.

2 13. In mid-January, I spoke with FTE's sole independent member of the Board of
3 Directors, Joseph Cunningham ("Cunningham"). I learned of the deteriorating condition of FTE
4 and that FTE's two other Directors, Michael Beys ("Beys") and Richard DaSilva ("DaSilva")
5 had proposed that, in exchange for a modest amount of capital, FTE should grant DaSilva and/or
6 his affiliated company, full and perpetual control of the Company through the issuance of a new
7 class of super voting convertible stock. Cunningham told me he refused to assent to this plan
8 because it was definitely not in the best interest of shareholders, who have been in the dark about
9 FTE's operations for almost two (2) years. Cunningham further expressed that he believed that
10 Beys and DaSilva were going to attempt to execute their plan and issue stock without his consent
11 or shareholder approval as required. If Beys and DaSilva attempted to issue this stock, it would
12 result in a significant dilution of the shareholder's voting rights and allow the current embattled
13 management to remain in power.

14 14. My conversation with Cunningham led me to organize a group representing what
15 I believe is a majority of the other stockholders, and we amended the bylaws to prohibit the
16 current Board from attempting to execute their plan, or a poison pill or any other sort of improper
17 stock issuances without shareholder consent.

18 Dated this 17th day of March, 2022.

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THOMAS COLEMAN